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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 GREGORIA MARQUEZ,
11 Plaintiff,

12 v.

13 HARBORVIEW MEDICAL CENTER,
14 Defendant.

CASE NO. C16-1450 RSM

STIPULATION AND MOTION TO
EXTEND DISCOVERY CUTOFF TO
COMPLETE DISCOVERY

15
16 The parties to this action, by and through their counsel, jointly stipulate and respectfully
17 request that the Court order a limited extension of the discovery cutoff to allow (1) plaintiff to
18 respond to defendant's written discovery requests; and (2) defendant to then complete
19 plaintiff's deposition.

20 1. This is an employment discrimination matter. This matter was originally filed in
21 state court and was removed to this Court when plaintiff amended her state law complaint to
22 add a claim under 28 U.S.C. § 1983. In that same amendment, plaintiff also added other claims
23 against defendant as well as adding additional factual allegations in her complaint.

24 2. The Order Setting Trial Date and Related Dates was entered by this Court on
25 November 18, 2016. Dkt. 14. The Court set a discovery cutoff of November 6, 2017.
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1 3. On September 27, 2017, defendant served plaintiff with written discovery
2 requests pertaining to her new claims in this matter as well as the additional factual allegations
3 contained in the amended complaint. On the same day, defendant also served plaintiff with a
4 notice of deposition. Plaintiff's responses to the written discovery were due on Friday,
5 October 27, 2017; defendant noted plaintiff's deposition for the following Friday, November 3,
6 2017. (Prior to removal, defendant had deposed plaintiff, but had not completed that deposition
7 and particularly had not inquired regarding the new claims and new facts alleged in the
8 amended complaint.)

9 4. Plaintiff and Defendant discussed the possibility of settlement. Unfortunately,
10 the parties have been unable, at this time, to agree on material terms of a settlement. As such,
11 Plaintiff's delay in responding was in part to see whether this matter could be resolved without
12 further time spent on discovery. Plaintiff has requested an extension of time to respond to the
13 written discovery until Friday, November 10, 2017, and has proposed postponing her
14 deposition until the following Friday, November 17, 2017. Both dates are after the current
15 discovery cutoff.

16 5. Defendant is willing to postpone the discovery as requested so long as the Court
17 provides its permission and so long as no other discovery is conducted after the cutoff.

18 6. The parties have conferred with each other, and agree the Court should order the
19 following relief:

- 20 a. The discovery cutoff is extended to Friday, November 17, 2017, for the
21 sole purposes of allowing plaintiff to respond to defendant's written
22 discovery and to allow defendant to complete its deposition of plaintiff.
- 23 b. Plaintiff shall respond to defendant's written discovery on or before
24 Friday, November 10, 2017.
- 25 c. Plaintiff shall appear for deposition on Friday, November 17, 2017.
- 26 d. No other deadlines shall be altered.

1 7. The parties stipulate to entry of the order below.

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3 DATED this 2nd day of November, 2017.

4 **CHUNG, MALHAS & MANTEL, PLLC**

HARBORVIEW MEDICAL CENTER

5 By s/ Edward C. Chung
6 Edward C. Chung
7 1511 Third Ave., Suite 1088
8 Seattle, WA 98104
9 echung@cmmlawfirm.com
10 Attorney for Plaintiff

 By s/ Diana S. Shukis
 Diana S. Shukis
 Victoria M. Slade
 GARVEY SCHUBERT BARER
 1191 Second Avenue, 18th Floor
 Seattle, WA 98101-2939
 Phone: (206) 464-3939
 Fax: (206) 464-0125
 dshukis@gsblaw.com
 vslade@gsblaw.com
 Attorneys for Defendant

11 **ORDER**

12 Based on the foregoing stipulation, and for good cause shown,

13 IT IS SO ORDERED this 3rd day of November 2017.

14 

15 RICARDO S. MARTINEZ
16 CHIEF UNITED STATES DISTRICT JUDGE